

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Luminara Worldwide, LLC,

Plaintiff,

vs.

Liown Electronics Co. Ltd., Shenzhen Liown
Electronics Co. Ltd., Liown
Technologies/Beauty Electronics, LLC, Boston
Warehouse Trading Corp., Abbott of England
(1981), Ltd., BJ's Wholesale Club, Inc., Von
Maur, Inc., Zulily, Inc., Smart Candle, LLC,
Tuesday Morning Corp., Ambient Lighting
Inc., The Light Garden, Inc., and Central
Garden & Pet Co.,

Defendants.

Shenzhen Liown Electronics Co. Ltd., Liown
Technologies/Beauty Electronics, LLC, and
Central Garden & Pet Co.,

Counterclaim Plaintiffs,

vs.

Luminara Worldwide, LLC, QVC, Inc.,
Darice, Inc., Bed Bath & Beyond, Inc.,
Williams-Sonoma Stores, Inc., PC Treasures,
Inc., and Brookstone Stores, Inc.,

Counterclaim Defendants.

No. 14-cv-03103-SRN-FLN

**SUPPLEMENTAL
DECLARATION OF THOMAS
MILLIKAN IN SUPPORT OF
DEFENDANTS' MOTION TO
COMPEL DEPOSITION TIME,
DISCOVERY REQUESTS AND
DISNEY ENTERPRISES
PRIVILEGE LOG**

I, Thomas Millikan, hereby declare as follows:

1. I am an attorney at the law firm of Perkins Coie LLP, counsel for Defendants and Counterclaim Plaintiffs in the above-referenced action. This declaration is submitted on behalf of Defendants Motion to Compel (Dkt. Nos. 268-71). This declaration is made on my own personal knowledge.

2. On September 21, five days after the hearing on Defendants' motion (Dkt. No. 285), Disney Enterprises, Inc. ("DEI") filed a supplemental declaration and revised privilege log. Dkt. No. 288. Defendants are filing this declaration to clarify the impact of Disney's new declaration and accompanying revised privilege log on the motion pending before the Court.

3. DEI's submission resolves DEI's obligation to provide company affiliation and attorney/non-attorney status information for named individuals. Dkt. 270 at 28-29; Defendants' Oral Argument Slide Presentation at 19-22, and 24.

4. All other issues raised in Defendants' motion, including the Disney privilege log and other discovery, remain pending before the Court.

Dated this 25th day of September, 2015.

/s/ Thomas N. Millikan

Thomas N. Millikan